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Chapter 9 Counsel for Tulare Local Healthcare District

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-70

Chapter 9

Date: N/A
Time: N/A
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

**APPLICATION FOR ORDER SHORTENING TIME
FOR HEARING ON MOTION FOR APPROVAL OF COMPROMISE OF
CONTROVERSIES
(MB EQUIPMENT FINANCE, LLC AND MB FINANCIAL BANK, N.A.)**

TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY

JUDGE:

The District, by and through counsel, respectfully seeks an Order Shortening
Time for notice on the above referenced Motion as follows:

RELIEF SOUGHT:

Order Approving Compromise of Controversies with Celtic Commercial Finance,
a division of MB Equipment, LLC and MB Financial Bank, N.A.

1 Attached as Exhibit A is a copy of the proposed Motion showing the relief sought.

2 **REASON FOR REQUEST:**

3 The Declaration in Support describes the reason for the requested order
4 shortening time.

5 **DATE REQUESTED:** January 17, 2019 at 9:30 a.m.

6 WHEREFORE, the District requests that this Court enter its Order as follows:

- 7 1. That this Application be granted;
8 2. That the time for notice be shortened;
9 3. That notice be given to all secured creditors and counsel, if known; the
10 twenty largest unsecured creditors; parties requesting special notice; Adventist Health;
11 Wilmington Trust; the Debtor; and the U.S. Trustee's Office.

12 4. The Hearing be held at the above date and time.

13 5. The District shall give notice to the required parties on or before January
14 4, 2019, by email and first class mail;

15 6. Objections, if any, can be presented:

- 16 ☐ At the time of the ☒ Up to one (1) court day prior to the
17 hearing; and hearing;

18 7. For such other relief as is just and proper.

19 Dated: January 4, 2019

20 WALTER WILHELM LAW GROUP,
a Professional Corporation

21 By: Riley C. Walter
22 Riley C. Walter, Chapter 9 Counsel for
23 Tulare Local Healthcare District, dba
24 Tulare Regional Medical Center
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